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ICI Americas Inc.

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Agricultural
Chemicals
Division

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 20, 1987

Mr. William H. Miller
Product Management Team (16)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

Dear Mr. Miller:

RE: TALON® WEATHER BLOK®

On January 12, 1987, ICI Americas received a Hotline call regarding a possible brodifacoum poisoning incident at the Denver Zoo. As a follow-up we contacted Dr. David Kenny at the Denver Zoo on January 23, 1987. He said he had lost ten birds from the exhibit since last November and that this coincided with the use of TALON WEATHER BLOK in mouse bait stations throughout much of the zoo. There had been a massive die-off of mice, so he suspected secondary poisoning.

The birds consisted of several species and were mostly carnivorous. Autopsy results were consistent with anticoagulant poisoning. Liver residues were conducted by the Denver Federal Center and indicated about 0.5 to 1.5 ppm. Examples were 0.8 ppm for a plover, 0.5 for a sissa, 1.5 to 1.6 ppm for Franklin's gulls, and 1.6 ppm for a laughing gull.

ICI pointed out to Dr. Kenny that these residue levels were quite high to be resulting from secondary accumulation. He said he would not expect the meat-eating birds to be attracted to the block directly. However, he did note that a keeper had reported seeing a mouse carrying a piece of the block from a station into its burrow within one of the bird enclosures.

We reminded Dr. Kenny that our label notes the product is toxic to wildlife and can pose a secondary hazard to birds of prey. ICI views this incident as the result of misuse of our product.

Wilmington, Delaware 19897 Phone (302) 575-3000

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4/9/2001 from EFED